



SMITH EIBELER, LLC

Christopher J. Eibeler
Attorney At Law
CJEibeler@SmithEibeler.com
www.SmithEibeler.com
tel. 732.935.7246
fax. 732.444.1096

January 28, 2019

Via Email and Regular Mail

John P. Ferguson, Esq.
Cobb Cole
149 South Ridgewood Avenue
Suite 700
Daytona Beach, FL 32114

Re: Christopher Adams v. SCCY Industries, LLC

Dear Mr. Ferguson:

This letter is written in response to your January 27, 2020 letter. While we appreciate your concerns regarding my client's legal and ethical issues, we disagree with your assertions. We will, however, afford you an opportunity to identify the specific paragraphs you allege to be offensive. We will then review your suggestions and either revise the Complaint or redact the portions to alleviate your concerns.

Please provide the identified portions of the Complaint in which you claim privilege by **no later than close of business, January 29, 2020**. If we do not receive this information prior to this deadline, we will view your client's failure to identify all allegations in which they claim privilege as a waiver and proceed accordingly. We are also willing to provide your client additional time to review and respond to the allegations per your request. However, in order to provide you and your client the additional time, we will need to immediately enter into a tolling agreement. I have enclosed my standard tolling agreement for your review and consideration. The tolling agreement must also be in place no later than close of business, January 29, 2020.

I look forward to hearing from you. My client reserves all his rights and remedies.

Very truly yours,

SMITH EIBELER, LLC

CHRISTOPHER J. EIBELER

CJE/led
Enclosure